

# Exhibit E

**2011 Futurewei Employment Agreements**

#	Date	Assignment Provision Similar to Huang's?	Starting Bates
1	1/3/2011	Yes	HUAWEI_TX_3300991
2	1/3/2011	Yes	HUAWEI_TX_3300999
3	1/17/2011	Yes	HUAWEI_TX_3301005
4	3/21/2011	Yes	HUAWEI_TX_3301015
5	3/21/2011	Yes	HUAWEI_TX_3301025
6	4/4/2011	Yes	HUAWEI_TX_3301038
7	4/18/2011	Yes	HUAWEI_TX_3301048
8	4/25/2011	Yes	HUAWEI_TX_3301058
9	5/9/2011	Yes	HUAWEI_TX_3301068
10	5/31/2011	Yes	HUAWEI_TX_3301079
11	6/20/2011	Yes	HUAWEI_TX_3301089
12	6/20/2011	Yes	HUAWEI_TX_3301099
13	7/5/2011	Yes	HUAWEI_TX_3301109
14	7/11/2011	Yes	HUAWEI_TX_3301119
15	8/1/2011	Yes	HUAWEI_TX_3301129
16	8/8/2011	Yes	HUAWEI_TX_3301139
17	8/15/2011	Yes	HUAWEI_TX_3301149
18	8/22/2011	Yes	HUAWEI_TX_3301160
19	9/6/2011	Yes	HUAWEI_TX_3301170
20	9/26/2011	Yes	HUAWEI_TX_3301180
21	10/31/2011	No (Contained reference to Cal. Labor Code)	HUAWEI_TX_3301190
22	11/7/2011	No (Contained reference to Cal. Labor Code)	HUAWEI_TX_3301202
23	11/7/2011	No (Contained reference to Cal. Labor Code)	HUAWEI_TX_3301214
24	11/11/2011	No (Contained reference to Cal. Labor Code)	HUAWEI_TX_3301226
25	11/28/2011	No (Contained reference to Cal. Labor Code)	HUAWEI_TX_3301238

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**HUAWEI TECHNOLOGIES CO., LTD.**,  
a Chinese corporation, and  
**FUTUREWEI TECHNOLOGIES, INC.**, a  
Texas corporation,

Plaintiffs,

v.

**YIREN RONNIE HUANG**, an individual, and  
**CNEX LABS, INC.**, a Delaware Corporation,

Defendants.

**No. 4:17-cv-893 ALM**

Jury Trial Demanded

**FILED UNDER SEAL**

**DECLARATION OF JESSE M. COLEMAN**

I, Jesse M. Coleman, pursuant to 28 U.S.C. § 1746, hereby declare:

1. I am a member of the bar of the State of Texas and the United States District Court for the Eastern District of Texas. I am a partner in the law firm Seyfarth Shaw LLP, attorneys for Plaintiffs Huawei Technologies Co., Ltd. and Futurewei Technologies, Inc. (“Plaintiffs”) in this action.

2. I have personal knowledge of the facts stated below and with the proceedings in this case.

3. I submit this declaration in support Plaintiffs’ response in opposition to Defendants CNEX Labs, Inc.’s and Yiren “Ronnie” Huang’s (“Defendants”) first motion for summary judgment, related to Plaintiffs’ claims for Huang’s breaches of this employment agreement with Futurewei.


4. I have reviewed the employment agreements Futurewei entered into in 2011. The chart entitled “2011 Futurewei Employment Agreements” and attached as Exhibit E to Plaintiffs’ response reflects the results of that review. Specifically, I have noted whether each employment

agreement contains an assignment clause similar to the one in Huang's employment agreement or one that differs from Huang's by including a notice pursuant to the California Labor Code.

5. Plaintiffs have also produced the 2011 employment agreements for Defendants' review.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 10th day of January 2019.

  
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JESSE M. COLEMAN  
Harris County, TX